

# EXHIBIT B

Giavonna Lewis  
08/05/2024

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1                   UNITED STATES DISTRICT COURT  
IN AND FOR THE DISTRICT OF WYOMING

3 STEPHANIE WADSWORTH,  
4 Individually and as Parent  
and Legal Guardian of W.W., K.W.,  
G.W., and L.W., minor children,  
5 and MATTHEW WADSWORTH,

6 Plaintiffs,

7 vs. Case No.  
2:23-cv-00118-NDF

9 WALMART, INC. AND JETSON  
ELECTRIC BIKES, LLC.

10 ELECTRIC DRIES, ETC.,  
Defendants.

13  
14           REMOTE DEPOSITION OF DR. GIAVONNI LEWIS

21

22

23      Reported By:

24 Joan Ferrara, RMR, FCRR

25 Job No. 44610

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1 or changes in the scarring and/or grafting.

2 Q Okay. As far as -- and I think  
3 we'll probably just talk a little more  
4 generally now for the typical procedures  
5 that you would expect.

6 Stephanie went through it looks  
7 like about five laser treatment surgeries  
8 following her burn injuries.

9 Is there an expected period of  
10 time in which laser treatments are ongoing  
11 after discharge based on the burn injuries?

12 A So we evaluate for scars after  
13 the burn is healed or the wound is healed  
14 with or without grafting.

15 Typically around six months to  
16 eight months after things have settled, we  
17 will make recommendations as to surgical  
18 interventions for scar releasing or  
19 reconstruction or laser treatment. And  
20 that treatment can be up to six to eight  
21 sessions with about two months in between.

22 We do tend to see some  
23 resolution or improvement in the scar  
24 profile after about six treatments. And so  
25 at that point, it becomes more of a shared

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1 decision as to whether or not more  
2 treatment is required based on the  
3 patient's symptoms and function.

4 Q For Stephanie Wadsworth, she was  
5 in your hospital from February 1 of 2022  
6 until March 21 of 2022, and then she  
7 received her first laser treatment on  
8 September 6, 2022.

9 So that seems to coincide with  
10 what you're saying as far as six to eight  
11 months later is when the laser treatment  
12 would be expected to start.

13 Does that sound about right?

14 A Correct.

15 Q And then typically you would  
16 expect about six to eight laser treatment  
17 sessions?

18 A Correct.

19 Q Is that --

20 A And we check in every four  
21 sessions to determine progress improvement.

22 Q And once the six to eight  
23 sessions are complete, and just speaking  
24 generally now, does that generally run the  
25 course of the laser treatment surgery?

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1 MR. AYALA: Form.

2 A That ends the course, but we can  
3 have multiple rounds if the symptoms recur  
4 or the scar shrinks back, they have a  
5 functional issue.

6 Q So would you consider one round  
7 of laser treatment surgery, is that six to  
8 eight sessions?

9 A Correct.

10 Q And it sounds like the six to  
11 eight sessions are generally done on  
12 two-to-three-month time periods?

13 A Correct.

14 Q And it sounds like when you are  
15 about halfway through the first session, is  
16 that when you reevaluate the laser  
17 treatments and determine what may be needed  
18 going forward?

19 A Correct. We assess through both  
20 functional evaluation with our physical  
21 therapist as well as a physician  
22 appointment to assess the progress of the  
23 scar and determine if more treatment would  
24 be suitable for the state and the function  
25 and proceed with more laser treatments, if

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1 indicated.

2 Q What would be the conditions  
3 that would necessitate further laser  
4 treatment beyond the first group?

5 A So specifically the first round?

6 Q Correct, first round. Thank  
7 you.

8 A The reasons patients come back  
9 is two-fold. One, patients tend to gain  
10 weight, which puts stretch and tension and  
11 tightness on their scars because they won't  
12 grow with them, and so they can experience  
13 intense itching and neuropathic pain. They  
14 can also experience contractures and  
15 functional losses related to that.

16 And then the other is that the  
17 scar maybe doesn't maintain or stabilize  
18 with the first round of treatment. And so  
19 all of the original symptoms that led us to  
20 the laser treatment recur or relapse and so  
21 it requires more laser treatment to help to  
22 settle down the symptoms and improve  
23 function.

24 Q And it sounds like at least as  
25 you sit here today, you don't have any

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1 recommendations going forward at this point  
2 as far as how many rounds, whether the  
3 first round will be sufficient for  
4 Stephanie or if there are additional rounds  
5 that may be needed?

6 A I would defer to our medical  
7 record because we typically have another  
8 physician evaluation determining if we will  
9 continue with laser treatment, or hold and  
10 assess later, based on patient symptoms and  
11 function.

12 Q Okay. And would that be in the  
13 medical record that is associated with the  
14 laser treatments?

15 A Correct.

16 Q Okay. So at some point within  
17 the laser treatment record, there should be  
18 some indication as to the progress that she  
19 is making in that regard?

20 A Correct.

21 Q Would Dr. Thompson, being at  
22 least the listed attendee care physician  
23 for Stephanie, would that be a better  
24 question for Dr. Thompson?

25 A If it's related to discharge

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1 A Okay.

2 Q Because this is her third laser  
3 treatment when she received her first one  
4 on September 6th of 2022.

5 A Okay. I will defer to the  
6 records as they are.

7 Q As you said, we'll defer to the  
8 records.

9 All right. If you could just  
10 take a look at this and I'll page through  
11 to the next page if you need me to, just to  
12 let me know if, number one, this triggers  
13 any memories on your end as far as her  
14 treatment, and number two, if this provides  
15 any guidance for you as to what she may  
16 need going forward.

17 A Sure. Well, this is laser  
18 treatment number three. So it's kind of --  
19 it's one treatment before a fourth  
20 treatment, which again the reason why we've  
21 arbitrarily used the fourth treatment as an  
22 important timeline is because that's where  
23 we tend to see stabilization of the scar  
24 and more significant changes and/or  
25 improvements.

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1                   And so at the third laser  
2   treatment, it's really hard for me to say  
3   based on this that we would provide more or  
4   less. It's more of the assessment. And  
5   right here we're still in the basic history  
6   present illness as to why she presented for  
7   her third laser.

8                   Q        Okay. And just for the record,  
9   we are referring to laser treatment number  
10 three record, which is STEPH 00225.

11                  Let me see if I can dig up  
12 number four for you, since that seems like  
13 it may be the better one for you to look  
14 at.

15                  A        Also, images are more visually  
16 helpful.

17                  Q        Okay. I will have the fourth  
18 one dug up so we can go through that at  
19 some point here.

20                  I don't want to keep you on the  
21 line while I'm digging through these. All  
22 right. So I will have that pulled up and  
23 we will look at that in a little bit.

24                  As far as the rounds of laser  
25 treatment, are subsequent rounds also six

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1 history, there would be an area of the  
2 physical exam and what we are planning to  
3 do for the patient and our assessment of  
4 all of the information.

5 This, based on what I'm seeing  
6 currently, it just supports the fact that  
7 he still has ongoing scars, he tolerated  
8 the laser treatments, and he's doing well.  
9 So this is the H&P for the procedure.

10 There should be a separate note  
11 outside of the burn laser H&P to assess.

12 So the attending will see the  
13 patient outside of the laser treatment  
14 sessions to provide an assessment and note  
15 to determine if further treatment is  
16 required.

17 Q Okay. Is that done on the third  
18 laser treatment as well or would that be  
19 more something that is done on the fourth  
20 at the midpoint for Weston?

21 A It's after the fourth treatment  
22 before the fifth treatment.

23 Q Okay. So since that was the  
24 third treatment, laser treatment, and we  
25 don't have a record of at least the fourth

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1 yet, that's what we would be looking for  
2 once we get the fourth laser treatment  
3 record?

4 A Correct.

5 Q Okay. All right.

6 And then looking at Stephanie's  
7 fourth laser treatment record, which I'll  
8 pull up here -- this should be all of it.

9 A Uh-huh.

10 Q And this was the first page that  
11 you had looked at before.

12 A Right.

13 Q But if you want to look at  
14 anything further on here, let me know.

15 A We can keep going. Okay, keep  
16 going. More. Keep going. Stop there.  
17 Okay, keep going. You can keep going. And  
18 you can hold there. Okay, you can keep  
19 going. And here.

20 So this outlines what we  
21 essentially do as part of the practice. So  
22 she is receiving her laser treatment on the  
23 day of this service for number four, and  
24 the areas that are being treated are also  
25 listed and there's been improvement for

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1 both feet.

2                   And then there, again, she will  
3 need a burn attending clinic visit. That  
4 will be the discussion about an assessment  
5 of the status of her burn injuries and  
6 scars and determination of further  
7 treatment and plans.

8                   Q         Would that be an in-person burn  
9 attending clinic visit at the hospital?

10                  A         Typically, yes. Sometimes we do  
11 them virtually, but our preference is in  
12 person.

13                  Q         And when that clinic visit  
14 occurred or will occur, that's when further  
15 discussion will happen as far as how future  
16 laser treatments may be utilized?

17                  A         Correct.

18                  Q         And since she is still on her  
19 first round of laser treatments, is that  
20 assessment done at this point after the  
21 fourth laser treatment or is that done at  
22 the end of the course of the six to eight  
23 sessions?

24                  A         So we do an assessment after the  
25 fourth laser, and then after every fourth

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1 assessment or fourth laser, or if we have  
2 decided not to do any further laser if it's  
3 anywhere between numbers five to eight,  
4 then we will have a follow-up attending  
5 appointment to determine if they are, in  
6 fact, okay and don't require any further  
7 intervention currently. And then we move  
8 into the watchful waiting period and then  
9 determine if we're okay to kind of be less  
10 aggressive and sort of evaluate as needed.

11 Q And is Dr. Chris LaChapelle, is  
12 he with your clinic in Salt Lake City?

13 A Yes. He's one of the burn  
14 surgeons, yes.

15 Q So at this point is  
16 Dr. LaChapelle, is he the attending, in  
17 essence, for the laser treatment side of  
18 it?

19 A Correct, for this particular  
20 procedure, uh-huh.

21 Q So is it just on a procedure  
22 basis or is it on a patient basis?

23 A On a procedure basis, because  
24 this is a shared model.

25 Q As far as who is making the call

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1 your experience, at least here in Utah,  
2 since 2012 I believe you said, in this burn  
3 unit you have seen and cared for patients  
4 who have been very responsive to an initial  
5 laser treatment session and others that  
6 require more laser treatment sessions. Is  
7 that fair?

8 A Correct.

9 Q Okay. Sitting here today, just  
10 based on the limited records that you've  
11 been shown -- because you don't have an  
12 independent recollection of Stephanie or  
13 Weston Wadsworth, correct?

14 A Correct.

15 Q Sitting here today, you don't  
16 have an opinion one way or another whether  
17 Stephanie Wadsworth is going to require an  
18 additional session after this first six or  
19 eight treatments of laser. Is that fair?

20 A That is fair.

21 Q Okay. Certainly, there is a  
22 possibility that she may need additional  
23 sessions just based on your own experience  
24 in treating burn victims like Stephanie?

25 A Correct.

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1 Q Same type of question as to  
2 Weston. Sitting here today, you don't have  
3 an understanding as to whether he's going  
4 to require an additional session of laser  
5 treatments following the first six to  
6 eight. Is that fair?

7 A Correct.

8 Q What you did say about Weston,  
9 in particular, based on at least some of  
10 the photographs that you were shown, the  
11 fact that he has -- his area of focus, if  
12 you will, is over the knee and the joint, I  
13 believe you said that that's a high stakes  
14 area?

15 A Correct.

16 Q That requires continued  
17 follow-up and evaluation up through the age  
18 of majority, so the age of 18?

19 A Correct. Technically, physical  
20 maturity for boys could be up to 21, but  
21 technically 18 or physical maturity.

22 Q Okay. And with regards to these  
23 high stakes areas such as knees and joints,  
24 what are some of the complications at the  
25 very least that you would be concerned